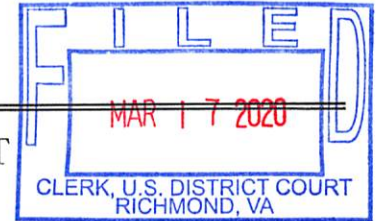


AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Eastern District of Virginia



United States of America
v.
Kamal ROSS

Case No. 3:20-mj-

46

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 15, 2020 in the county of Richmond City in the
Eastern District of Virginia, the defendant(s) violated:

Code Section

Offense Description

Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), to wit, Kamal Ross, did knowingly, unlawfully, and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Rodney D. Ward Task Force Officer
Printed name and title

Sworn to before me and signed in my presence.

Date: 03/17/2020

Is/

Judge's signature

City and state: Richmond, Virginia

Roderick C. Young, U.S. Magistrate Judge
Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA

v.

KAMAL ROSS,

Defendant.

)
)
) Criminal No. 3:20-mj-46
)
)
)
)

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, Rodney D. Ward, Task Force Officer, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. Your affiant is a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), being duly deposed and sworn, state that:

2. Your affiant is a graduate of the Virginia State Police. As such, your affiant served as a Virginia State Trooper with the Virginia State Police, for 18 years. As a sworn police officer, your affiant, was responsible for investigations of various crimes, including robbery, malicious wounding, burglary, and assault.

3. Since September 2014, your affiant has been employed as a TFO with the ATF. As a TFO with ATF, your affiant has led and/or participated in numerous felony criminal investigations/arrests in the Commonwealth of Virginia, and the Federal Eastern District of Virginia. These cases have included multiple narcotics and/or firearms violations, in violation of provisions set forth in Titles 18 and 21 of the United States Code. Your affiant has authored several search and seizure and arrest warrants in connection with these investigations.

4. Your affiant graduated from the Basic Virginia State Police Academy (VSPA) in Richmond Virginia. The training provided at the VSPA included extensive coursework and practical exercises in Constitutional Law, Criminal Law, Fourth Amendment Law, State and Federal Court Procedures, Conspiracies and Partics thereto, Self-Incrimination, and Physical Evidence.

5. Your affiant is an investigator and law enforcement officer of the United States, who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18 and Title 21 of the United States Code.

6. This affidavit, which is based upon personal knowledge, information provided by other law enforcement personnel, evidence obtained during this investigation and conversations with cooperating individuals, is submitted in support of an application of a criminal complaint charging Kamal ROSS with knowingly, unlawfully, and intentionally distributing a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

7. This affidavit does not include all of the facts known to me regarding this investigation, only those sufficient to establish probable cause that federal laws have been violated.

Probable Cause

8. On January 15, 2020, a Richmond Police Department (RPD) officer utilized a reliable confidential informant to conduct a controlled purchase of cocaine base from Kamal ROSS.

9. Prior to the controlled purchase, the confidential informant was provided with a quantity of governmental funds for the purchase, searched for any contraband, and then equipped with audio and visual monitoring devices.

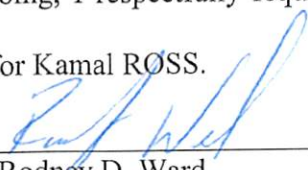
10. The confidential informant, while under law enforcement surveillance, then walked to the residence that ROSS directed him to visit for the purchase. Upon making contact with ROSS, the confidential informant exchanged United States currency for the suspected crack cocaine.

11. The purchased suspected crack cocaine was sent to the Drug Enforcement Administration Mid-Atlantic Laboratory and determined to contain a detectable amount of cocaine base, a Schedule II controlled substance.

CONCLUSION

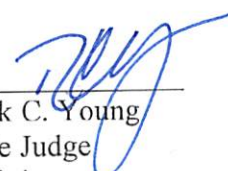
12. Based on all of the foregoing, I submit that there is probable cause to conclude that on or about January 15, 2020, Kamal ROSS, did knowingly, unlawfully, and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

13. In consideration of the foregoing, I respectfully request that this Court issue a Criminal Complaint and Arrest Warrant for Kamal ROSS.



Rodney D. Ward
ATF Task Force Officer

Sworn to and subscribed before me this 17th day of 2020.



The Honorable Roderick C. Young
United States Magistrate Judge
Eastern District of Virginia